



**Essential Fuels  
Facility No. 00-32519  
DRAFT  
Environmental Assessment**

**Montana Department of Environmental Quality  
Tanks, Brownfields, and Federal Facilities Bureau  
Underground Storage Tank Section  
DRAFT ENVIRONMENTAL ASSESSMENT**

<b>COMPANY NAME:</b> 26 Group LLC (Agent: Eric Reichert)		
<b>FACILITY NUMBER:</b> 00-32519		
<b>FACILITY NAME:</b> Essential Fuels		
<b>PERMIT NUMBER:</b> 23-0244		
<b>APPLICATION DATE:</b> 3/30/2023		
<b>LOCATION:</b> 401 North Main, Bridger, MT 59014 (GEOCODE: 10-0449-21-1-03-04-0000)		<b>COUNTY:</b> Carbon
<b>PROPERTY OWNERSHIP:</b>	FEDERAL ____ STATE ____ PRIVATE <u> X </u>	
<b>EA PREPARER:</b>	Kitrina Persson	<b>EA DATE:</b> 7/11/2023

**COMPLIANCE WITH THE MONTANA ENVIRONMENTAL POLICY ACT**

Under the Montana Environmental Policy Act (MEPA), Montana agencies are required to prepare an environmental review for state actions that may have an impact on the human or physical environment. The proposed state action is issuance of underground storage tank (UST) installation permit number 23-0244 and an operation permit allowing the operation of underground storage tanks at UST Facility number 00-32519. This environmental assessment (EA) will examine the proposed action, alternatives to the proposed action, and disclose potential impacts that may result from the proposed and alternative actions. The Department of Environmental Quality (DEQ) will determine the need for additional environmental review based on consideration of the criteria set forth in Administrative Rules of Montana (ARM) 17.4.608.

**SUMMARY OF THE PROPOSED ACTION:** Essential Fuels is proposing to install an UST system at their convenience store. The proposed UST systems include:

Tank(s): This project involves installing the following six (6) double-walled tanks:

Tank Number	Capacity in Gallons	Substance Stored
1	25,000	Diesel
2	25,000	Unleaded
3	12,000	Diesel
4	8,000	Premium
5	10,000	DEF
6	15,000	Off-Road Dyed Diesel

These tanks will be Xerxes double-walled fiberglass tanks with a monitored interstitial space.

Piping: All product piping associated with this facility will be OPW double-walled flexible piping. Approximately 1,400 feet of double-wall fiberglass piping will be utilized in these tank systems.

Sumps: A Xerxes fiberglass tank-top sump will be installed around the tanks' piping and access manways. Fiberglass containment sumps will be installed under each dispenser. These tank and piping systems will be continuously monitored. Monitoring will be accomplished via internal tank probes, interstitial tank sensors, pressurized mechanical line leak detectors as well as continuous sensor monitoring in all containment sumps. A Veeder Root (VR) TLS-450 Plus Automatic Tank Gauge (ATG) will continuously monitor all operational parameters.

Tank & Piping Monitoring System: The leak detection monitoring system consists of a Veeder Root (VR) TLS-450 Plus ATG, VR 332812-001 series probes, VR 794380-208 universal liquid sump sensors, and VR 794390-409 tank interstitial sensors.

**PURPOSE AND BENEFIT FOR PROPOSED ACTION:** DEQ's purpose in conducting this environmental review is to act upon 26 Group, LLC's application to authorize the installation of the new UST systems at Facility ID No. 00-32519 in Bridger, MT. DEQ's action on the permit application is governed by the Underground Storage Tank Installer and Inspector Licensing and Permitting Act, Section 75-11-212, et seq, Montana Code Annotated (MCA) and the Montana Underground Storage Tank Act, Section 75-11-501, MCA et seq. and administrative rules adopted under those Acts at Administrative Rule of Montana (ARM) Title 17, chapter 56.

The benefits of the proposed action include bringing a needed fuel store to the local area.

**REGULATORY RESPONSIBILITIES:** In accordance with ARM 17.4.609(3)(c), DEQ must list any state, local, or federal agencies that have overlapping or additional jurisdiction or environmental review responsibility for the proposed action and the permits, licenses, and other authorizations required.

The Montana DEQ Solid Waste Section and Hazardous Materials Section have reviewed this environmental assessment. Their comments have been addressed in this document. DEQ's Asbestos Control Program, and DEQ's tribal liaison coordinator were also consulted.

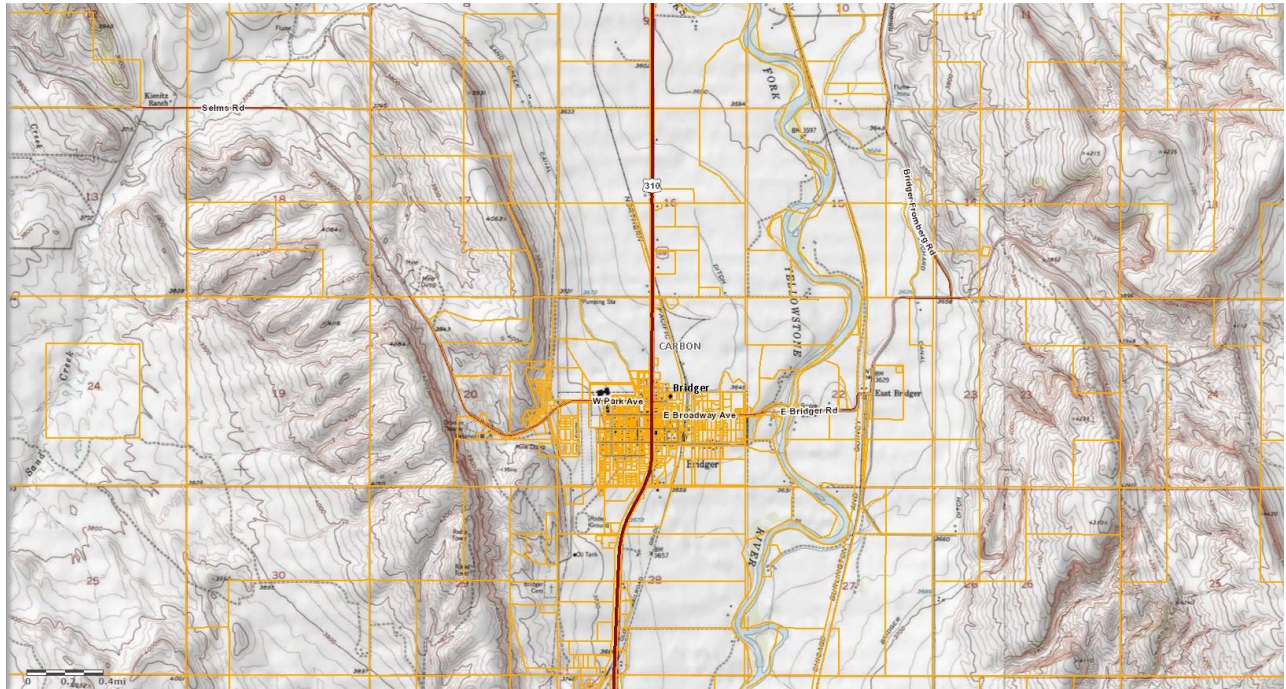
One building permit was issued to the applicant by the State of Montana, Building Codes Program in Helena, Montana for the location: 401 North Main, Bridger, MT, in Carbon County. The Building Permit number is 2023-BLDG-000270. This building permit includes electrical, mechanical, right-of-way, plumbing, fire and sign permits. The Town of Bridger does not specifically permit underground storage tanks. Soil disturbances and storm water runoff during construction are regulated under the Montana Pollution Discharge Elimination System (MPDES) Authorization. A General Permit for Storm Water Discharges associated with construction activity is permitted under permit number MTRNE0148.

**Table 1: Proposed Action Details**

Summary of Proposed Action	
General Overview	Construction of Convenience store with fueling canopies
Proposed Action Disturbance & Equipment	
Total Lot Acreage	27.327
Tank Basin Dimensions (LxWxD)	53x55x17
Piping Trench Linear Feet	782 LF
Electrical Supply Trench Linear Feet	680 LF
Truck traffic	Hauling in and out Materials and Equipment
Other equipment	Crane, Excavator, Loader, Skid Steer
Proposed Action	
Duration	<b>Construction Period:</b> 7/1/23-12/31/23 <b>Construction Hours:</b> 7am-7pm <b>Operational Hours:</b> When Open: 24 hours per day and 7 days a week pay at pump & 5am-10pm store hours <b>Tank Operational Life:</b> 30 Years
Construction Equipment	Crane (1day), Excavator, Loader, Skid Steer, Trucks
Location and Analysis Area	<b>Location:</b> US Hwy 310 Bridger, Montana, 59014 <b>Legal Description:</b> Section 21, Township 6 South, Range 26 East
Personnel Onsite	During construction, onsite personnel would vary per task, but generally would include 1-3 equipment operators and laborers. During operation, onsite personnel would consist of at least one trained Class A, B, and C operator to make sure everything operates safely and compliantly. Onsite personnel would be performing the Montana UST Program required monthly and annual walkthrough inspection. Since the site is a manned refueling site, a full-time onsite operator is always present.
Structures	During the UST installation project, there would be a temporary portable toilet. After UST installation, the site would be a manned retail fueling facility only open during store hours. Fueling 24 hours a day
Project Water Source	One water wagon or fire hydrant would be used for testing containment sumps after the UST installation is completed. After construction and installation of the UST is complete, operation of the underground fuel tanks would not use water or discharge any wastewater.

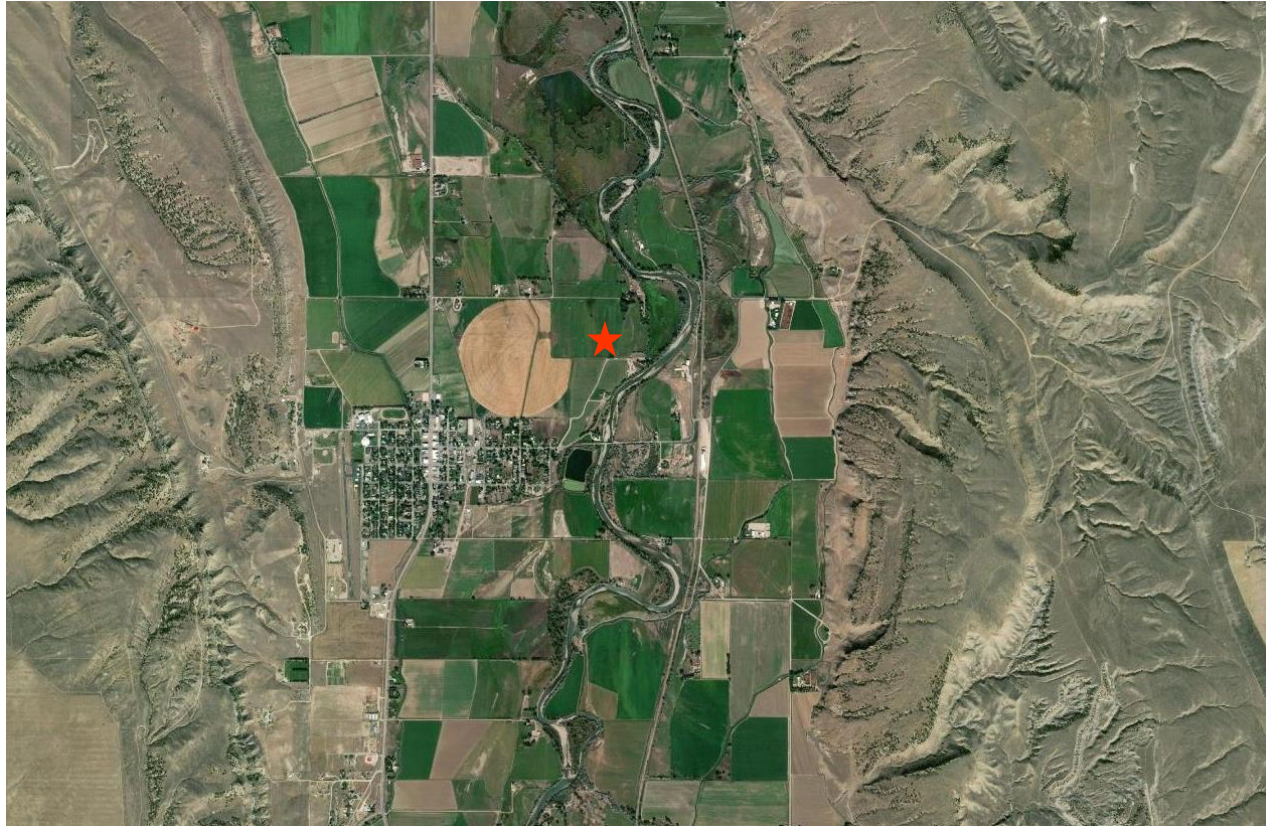
Supplemental Lighting	During the construction of the UST systems, supplemental lighting would not be anticipated. After installation, there would be area lighting associated with large retail fueling facility.
Air Quality	During the UST installation, there may be some dust suppression. After installation, the UST system includes four vertical vent standpipes and submerged fill pipes. Stage 1 vapor recovery is to be installed on all gasoline tank systems.
Water Quality	<p>Water used for containment sump testing must follow all applicable regulations, including proper disposal of spent test water.</p> <p>Stormwater would be managed under the Montana Pollutant Discharge Elimination System (MPDES) General Permit for Storm Water Discharges associated with construction activity.</p> <p>Protection of ambient water quality standards, drinking water maximum contaminant levels, and prevention of degradation of water quality would be achieved through secondarily contained non-corrodible underground tanks/piping and continuous system monitoring to reduce the chance of leaks and spills to the environment.</p> <p>Water used for containment sump testing must follow all applicable regulations, including proper disposal of spent test water.</p>
Solid Waste	Garbage cans and dumpsters would be used during installation to collect miscellaneous solid wastes and would be disposed of at a Montana-licensed solid waste management facility.
Hazardous Substances	<p>Equipment fuel and lubricants would be needed on the site during the construction phase of this project. Petroleum products would be stored in vehicles in original, labeled containers and a clearly labeled slip tank for fuel. No more than 5 gallons of oil and 125 gallons of fuel would be on site at any time during facility construction. The Montana state licensed UST installer would be performing daily inspections on his equipment to ensure that they are in good operating condition. The construction crew would be trained in spill and overfill containment and cleanup. Spill kits and absorbent pads would be always onsite on each truck.</p> <p>No hazardous waste generators are registered at the address listed in this EA.</p> <p>Once the underground storage tanks are permitted, installed, and tested, petroleum products would be stored in double-walled continuously monitored UST systems.</p>

**Figure 1:** Topographic Map of general location of the proposed Essential Fuels, in Bridger, MT FID: 00-32519

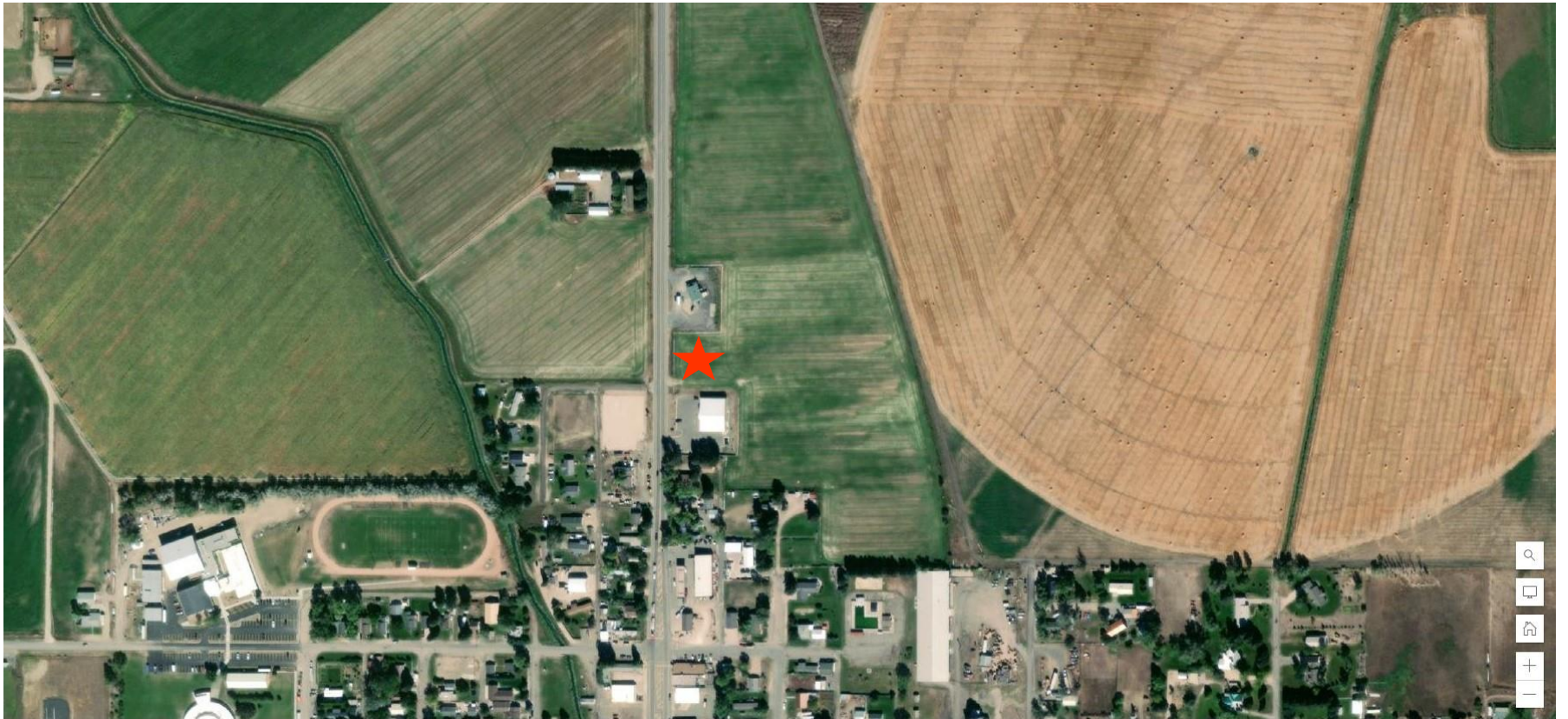




**Figure 2:** Proposed Project Site - Physical Address: 401 North Main, Bridger, MT FID 00-32519

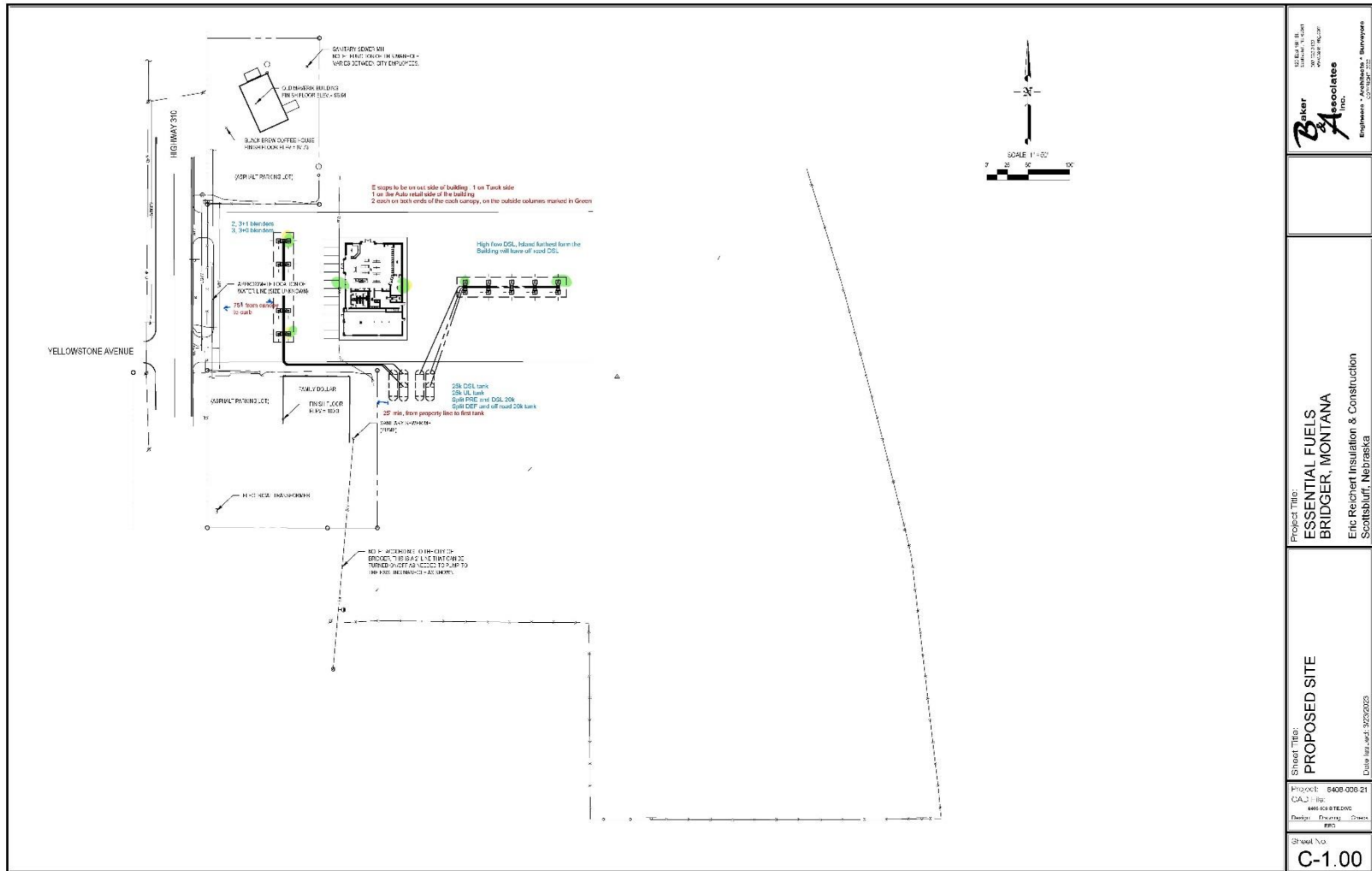


**Figure 3:** Proposed Project Site - Physical Address: 401 North Main, Bridger, MT FID 00-32519

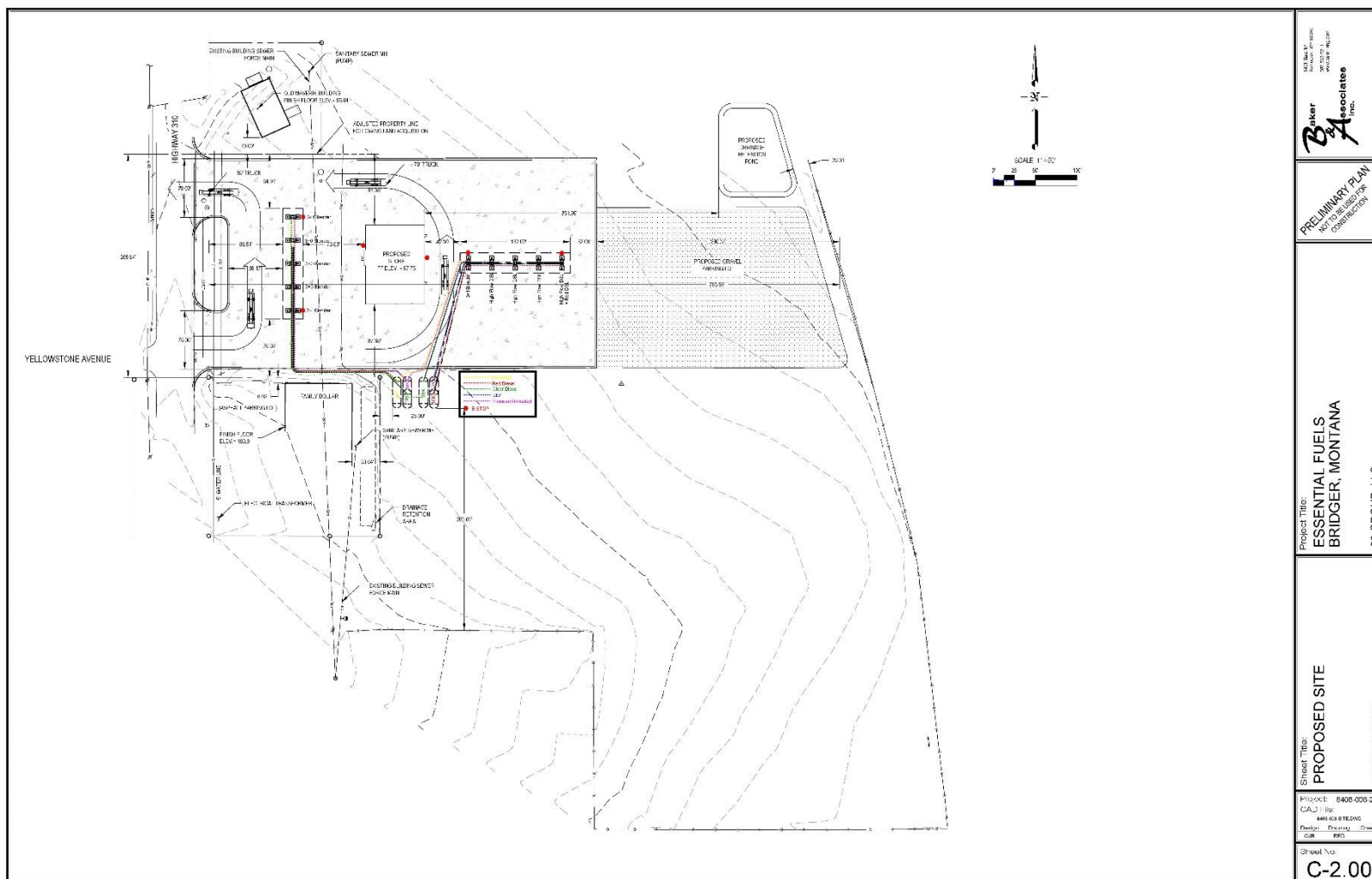




**Figure 4: Site Plan**



### Figure 5: Fuel System Layout



## SUMMARY OF POTENTIAL IMPACTS TO THE PHYSICAL AND HUMAN ENVIRONMENT:

The impact analysis will identify whether the impacts are direct or secondary impacts. Direct impacts occur at the same time and place as the action that causes the impact. Secondary impacts are a further impact to the human environment that may be stimulated, or induced by, or otherwise result from a direct impact of the action (ARM 17.4.603(18)). Where impacts would occur, the impacts analysis will also estimate the duration and intensity of the impact.

The duration is quantified as follows:

- **Short-term:** Short-term impacts are defined as those impacts that would not last longer than the installation of the USTs and operation of the UST Facility.
- **Long-term:** Long-term impacts are impacts that would remain or occur following tank closure and removal.

The intensity of the impacts is measured using the following:

- **No impact:** There would be no change from current conditions.
  - **Negligible:** An adverse or beneficial effect would occur but would be at the lowest levels of detection.
  - **Minor:** The effect would be noticeable but would be relatively small and would not affect the function or integrity of the resource.
  - **Moderate:** The effect would be easily identifiable and would change the function or integrity of the resource.
  - **Major:** The effect would alter the resource.
1. **GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE:** *Are soils present, which are fragile, erosive, susceptible to compaction, or unstable? Are there unusual or unstable geologic features? Are there special reclamation considerations?*

There are no known fragile or unstable soils identified in the project site by the reviewer. The facility area was formerly an irrigated field. There are no unusual or unstable geologic features or special reclamation considerations in the project area according to the 2023 Montana Bureau of Mines and Geology web mapping geologic application.

Montana Bureau of Mines and Geology Geologic map of the Bridger Quadrangle indicates primarily alluvial gravels consisting of gravel, sand, silt, and clay deposited by historical streams.

### ***Direct Impacts:***

No unusual or unstable geologic features are present, and no fragile or particularly erosive or unstable soils are present. All topsoil would be removed from the site during the construction phase of this project. Erosion control and other limits and conditions would be accomplished using a variety of Best Management Practices (BMP) including straw berms or straw bales placed at all

areas of potential runoff from operations to mitigate impacts to surface water quality from stormwater discharges associated with construction of the facility. During installation, impacts to the geology, soil quality, stability and moisture would be short-term and negligible. After construction has been completed, the entire area would be paved with concrete pads where necessary for traffic. Under ARM 17.56. subchapter 5, UST owners and operators are required to immediately report and clean up any surface spills.

***Secondary Impacts:***

No secondary impacts to the geology and soil quality, stability and moisture would be expected.

**2. WATER QUALITY, QUANTITY, AND DISTRIBUTION: *Are important surface or groundwater resources present? Is there potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality?***

The project area receives an average of 17.75 inches of precipitation annually according to NOAA National Centers for Environmental information. The project area lies within the Clark Fork Yellowstone watershed. The proposed UST site is approximately 3500 feet west of the highwater mark of the Clarks Fork Yellowstone River. Sand Creek Canal is a human-made irrigation canal that is approximately 700 feet to the west and runs parallel to Highway 310 through the town of Bridger.

There are 4 domestic wells within 1000 feet down and cross-gradient from the proposed site. For the project area, approximate depth to groundwater is between 25-35 feet (GWIC). The nearest well is approximately 200 feet down-gradient from the proposed tank installation area and is a private well owned by 26 Group, LLC. If a release of petroleum fuel occurred from the underground tank and piping system, it would enter the tank basin.

***Direct Impacts:***

If a release of petroleum fuel occurred from the underground tank and piping system, the release would enter the tank basin. The soil at the project site is alluvium, which is loose clay, silt, or gravel. The rate of petroleum movement through the soil column depends on the magnitude of the release and soil composition in the area, as well as other factors. If there was a release an environmental consultant would have to take soil borings, look at topography, slope, vegetation and the quantity of the product in order to make that determination. Depending on the quantity of a release and if it wasn't properly contained, product could move into native soil and potentially reach groundwater.

Secondarily contained non-corroding underground tanks/piping and continuous system monitoring would protect ambient water quality, drinking water quality and use, and prevent degradation of surface and ground water quality. Proper operation of this system would decrease the potential for violation of ambient water quality standards, drinking water maximum contaminant levels, and the degradation of water quality. Secondary containment and leak detection systems serve to mitigate the potential impacts by immediately reducing the amount of fuel available for release to the environment and by making early detection of releases

possible. The Facility UST systems must meet State installation standards and Montana DEQ UST program construction permit requirements and conditions. Adherence to State installation standards and permit requirements/conditions ensure that proper technology is implemented for cathodic, spill, and overfill protection.

Tank leak detection equipment would be installed at the facility. The facility would utilize tank interstitial monitoring sensors. Additional piping leak detection equipment would also be utilized, and liquid sensors would be placed in the tank top and transition sumps. If a leak occurred, the fuel pumping system would automatically shut down and could not be energized again until the source of the leak is identified and addressed. Further, leak detection systems must meet leak rate detection standards of a probability of detection of 0.95 and a probability of false alarm of 0.05. Finally, these systems are designed and programmed to shut down on detecting leaks as small as 0.2 gallons per hour.

The applicant would install an overfill prevention valve for overfill prevention on the tank systems and use secondary containment sumps. A single wall round tank top sump would be installed around the piping accesses to the tank. Sump boots, which provide a seal around each piping and conduit penetration to the sump, would be compatible with the piping and installed at each sump penetration. All sumps would be hydrostatically tested (filling it with water and pressurizing it to test for strength and leaks) according to the specific installation conditions.

Mitigation and monitoring plans reduce the likelihood of a petroleum fuel product release to the environment. Should a release occur, mitigation and monitoring plans also reduce the amount of product released to the environment. Immediate reporting, containment of any spills or overfills are required and would reduce surface and groundwater impacts. Direct impacts to surface and/or ground water are not expected. However, should a release occur, and it is not properly contained, the impacts could be long term and minor.

#### ***Secondary Impacts:***

No secondary impacts to water quality, quantity and distribution would be expected. However, should a catastrophic release of petroleum fuel product occur, and it is not properly contained, it could secondarily impact the applicant's private domestic well at 200 feet and the Sand Creek Canal at 700 feet from the project area. Impacts to the Clark Fork Yellowstone River are unlikely due to it being 3,500 feet from the project area

### ***3. AIR QUALITY: Will pollutants or particulate be produced? Is the project influenced by air quality regulations or zones (Class I Airshed)?***

The proposed project site is not located in a Class I Airshed according to EPA's AirData Air Quality GIS. The closest Class I Airshed is the US Forest Service North Absaroka Wilderness Area in Wyoming located approximately 50 miles southwest from the project site.

#### ***Direct Impacts:***

During construction of the UST installation project, dust particulate may become airborne.



However, the applicant would be required to comply with industry standard Best Management Practices for dust control, such as using water to suppress dust. Impacts to air quality during the UST installation project, would be short-term and negligible.

During operation of the UST system, natural air currents and tank vents would dissipate hydrocarbon vapors to a safe level. Petroleum vapors would be mitigated by natural air currents, submerged fill pipes, and properly designed vent pipes would control hydrocarbon vapors. Impacts to air quality would be long-term and minor.

***Secondary Impacts:***

No secondary impacts to air quality would be expected.

**4. VEGETATION COVER, QUANTITY AND QUALITY: *Will vegetative communities be significantly impacted? Are any rare plants or cover types present?***

The location of the proposed UST installation and convenience store is currently agricultural. Proposed development includes pavement, concrete pads, and a new building. The location currently is bordered to the north and south by commercial properties. To the east is agricultural and to the west, across N Main Street is commercial with agricultural beyond. No rare plants or cover types have been reported.

***Direct Impacts:***

All vegetation has been removed from the project area and much of the site is to be paved after completion. Due to the size of the project area and the absence of rare plants and cover, impacts to vegetative cover, quantity or quality resulting from this project would be long-term and negligible.

***Secondary Impacts:***

No secondary impacts to vegetation cover, quantity and quality would be expected.

**5. TERRESTRIAL, AVIAN AND AQUATIC LIFE AND HABITATS: *Is there substantial use of the area by important wildlife, birds, or fish?***

The project site is within a Core Area for sage grouse habitat as designated by the Montana Sage Grouse Habitat Conservation Program. The applicant submitted the project for review by the Montana Sage Grouse Conservation Program and was issued an approval letter which states that no mitigation plan is required for the proposed project. In order to be consistent with the Montana Sage Grouse Conservation Strategy weed management is required and reclamation of disturbed areas must include control of noxious weeds and invasive plant species including Cheatgrass (*Bromus tectorum*) and Japanese Brome (*Bromus japonicas*) throughout the proposed development project.

The Montana Department of Fish, Wildlife, and Parks MFISH database describes the Clarks Fork Yellowstone River as an area with substantial fisheries resource value. Some of the fish species documented are: the Brown Trout, Burbot, Goldeye, Lake Chub, Longnose Dace, Mountain Sucker, Mountain Whitefish, Rainbow Trout, Shorthead Redhorse, Stonecat, White Sucker, and Yellowstone Cutthroat Trout are residents.

***Direct Impacts:***

As Figures 1 and 2 depicts this Proposed Action would be in a currently disturbed property in the Town of Bridger, Montana. Any wildlife disturbance has already taken place due to the current anthropogenic impacts of the site. There is no substantial use of this area by important wildlife, bird, or fish. No impacts to important terrestrial, avian and aquatic life and habitats are expected.

***Secondary Impacts:***

No secondary impacts to terrestrial, avian, and aquatic life and habitats stimulated or induced by the direct impacts analyzed above would be expected. However, in the water quality section of this environmental assessment, it was identified that secondary impacts from a petroleum fuel release that is not properly contained could impact downstream aquatic life. This potential impact would be minor due to river being 3,500 feet from the project site and the leak prevention measures the UST system must have. Mitigation and monitoring plans reduce the likelihood of a petroleum fuel product release to the environment. Should a release occur, mitigation and monitoring plans also reduce the amount of product released to the environment. Immediate reporting, containment of any spills or overfills are required and would reduce surface and groundwater impacts. Direct impacts to surface and/or ground water are not expected. However, should a release occur, and it is not properly contained, the impacts could be long term and minor.

**6. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES: *Are any federally listed threatened or endangered species or identified habitat present? Any wetlands? Species of special concern?***

According to the Montana Natural Heritage Species of Concern Report (March 2022) there are no endangered species listed for Carbon County. There are three species listed as threatened in Carbon County: the Canada Lynx, Grizzly Bear and the Yellow-billed Cuckoo. However, no Canada Lynx, Grizzly Bear or Yellow-billed Cuckoo have been documented around the project area. According to the USFWS Threatened and Endangered Species Critical Habitat Report, June 2023, there is critical habitat for the Canada Lynx is approximately 21 miles southwest of the project site in the foothills of the Beartooth Mountains and the Absaroka Range. The United States Fish and Wildlife Service indicates that the Rufa Red Knot (shorebird) is known to occur in several areas in Montana. This species is listed as threatened under the Endangered Species Act. However, there is no critical habitat for this species in Montana.

No other species of concern or identified habitat area are identified within a mile of the project area.

***Direct Impacts:***

There are no federally listed endangered species, threatened species, species of concern, or identified habitat areas within the project area. Within the one-mile analysis area, no sightings of Canada Lynx, Grizzly Bear, Yellow-billed Cuckoo or Rufa Red Knot have been documented. No direct impacts to unique, endangered, fragile, or limited environmental resources are expected (see secondary impacts).

***Secondary Impacts:***

No secondary impacts to unique, endangered, fragile, or limited environmental resources that could be stimulated or induced by the direct impacts analyzed above would be expected. However, secondary impacts from a petroleum fuel release that was not properly contained could impact downstream aquatic life. This potential impact would be minor due to river being 3,500 feet from the project site and the leak prevention measures the UST system must have. Mitigation and monitoring plans reduce the likelihood of a petroleum fuel product release to the environment. Should a release occur, mitigation and monitoring plans also reduce the amount of product released to the environment. Immediate reporting, containment of any spills or overfills are required and would reduce surface and groundwater impacts. Direct impacts to surface and/or ground water are not expected. However, should a release occur, and it is not properly contained, the impacts could be long term and minor.

**7. HISTORICAL AND ARCHAEOLOGICAL SITES: *Are any historical, archaeological, or paleontological resources present?***

The State Historic Preservation Office (SHPO) was consulted and conducted an archeological resource file search for Section 21, Township 6 South, Range 26 East. The report results identified five previous cultural resource inventories and 13 previously recorded site within the designated search locale. All 13 of the sites are listed on the National Register of Historic Places (NRHP). None of the identified sites are within the project area, and none are listed as a district.

It is SHPO's position that any structure over fifty years of age is considered historic and is potentially eligible for listing on the National Register of Historic Places. If any structures are within the Area of Potential Effect, and are over fifty years old, SHPO recommends that they be recorded, and a determination of their eligibility be made prior to any disturbance taking place. As long as there would be no disturbance or alteration to structures over fifty years of age, SHPO determined that there is a low likelihood that cultural properties will be impacted.

Based on previous agricultural ground disturbance in the area SHPO feels that there is a low likelihood cultural properties will be impacted. Therefore, SHPO states that a recommendation for a cultural resource inventory is unwarranted at this time. However, should structures need to be altered or if cultural materials will be inadvertently discovered during this project, SHPO and DEQ are to be contacted, and the site investigated.

***Direct Impacts:***

There are no known historical, archaeological, or paleontological resources present within the project area. Project area is currently under construction for a convenience store. There is a low potential for intact buried deposits. No direct impacts to historical and archaeological sites are expected.

***Secondary Impacts:***

No secondary impacts to historical and archaeological sites are expected.

**8. AESTHETICS: *Is the project on a prominent topographic feature? Will it be visible from populated or scenic areas? Will there be excessive noise or light?***

The project is located in the Town of Bridger, Montana, which has a population of 735. There are no prominent topographic features within the project area.

***Direct Impacts:***

Essential Fuels would be visible from Highway 310. The property is on Main Street within the Town of Bridger. The proposed project (installation of underground storage tank systems, and operation of storage tanks and piping) would be buried underground. Appurtenant above ground equipment would be visible but is consistent with the existing character of the adjacent commercial properties. This project would not change the zoning of the project area which is Improved Property - Commercial. The zoning for this property was changed from agricultural to commercial before this project was started. Other neighboring existing businesses are Family Dollar, IM Equipment and Black Brew Coffee House. There are twelve residential properties (single family residences) within ½ mile of the project area. The project would be visible to the surrounding populated area; however, the proposed action would be similar to the commercial nature of the surrounding area.

During the construction of the UST installation project, there would be noise associated with the operation of heavy equipment. After the project is completed, there would be no noise from the underground storage tank. The activities associated with this UST installation are analyzed in the Cumulative Impacts section of this EA.

The above ground components of the UST systems at the proposed project would be visible to the surrounding population. Due to the limited above ground components of the UST system

(vent risers and fuel dispensers), the visual impacts would be long-term and negligible.

***Secondary Impacts:***

No secondary impacts to area aesthetics would be expected as a result of the proposed work.

**9. DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY: *Will the project use resources that are limited in the area? Are there other activities nearby that will affect the project?***

There are no other nearby activities identified near the project area that may be unduly impacted. The neighboring land uses are mixed commercial, agricultural with residential properties located within one mile of the project.

***Direct Impacts:***

The UST would be installed on existing commercial land. This UST installation project would not otherwise use existing environmental resources of land, water, air, or energy. This project would permit the installation an UST system with a permitted convenience store. This UST installation project would not otherwise use existing environmental resources of land, water, air, or energy. No impacts to environmental resources of land, water, air, or energy are expected.

***Secondary Impacts:***

No secondary impacts to environmental resources of land, water, air, or energy would be expected.

**10. IMPACTS ON OTHER ENVIRONMENTAL RESOURCES: *Are there other activities nearby that will affect the project?***

There are no other known environmental studies or projects on this land.

***Direct Impacts:***

Impacts on other environmental resources are not likely to occur as a result of this project.

***Secondary Impacts:***

. No secondary impacts to other environmental resources would be expected as a result of the proposed action.

**11. HUMAN HEALTH AND SAFETY: *Will this project add to health and safety risks in the area?***

***Direct Impacts:***

The applicant would be required to adhere to all applicable state, federal, and Town of Bridger safety laws. During the construction phase of this project, there are safety risks to the UST system



installation crew. Industrial work such as the work proposed by the applicant is inherently dangerous. The Occupational Safety and Health Administration (OSHA) has developed rules and guidelines to reduce the risks associated with this type of labor.

While the UST facility is in operation, it is anticipated that natural air currents and tank vents would dissipate hydrocarbon vapors to a safe level. Tank and piping leak detection equipment is designed to detect releases before serious environmental, health or safety problems occur.

Ambient water quality standards, drinking water maximum contaminant levels, and degradation of water quality would be protected by secondarily contained non-corroding underground tanks/piping with continuous system monitoring, which reduces the risk of a petroleum release into the environment.

Proper maintenance and operation of the installed leak detection systems and compliance with DEQ UST operating requirements mitigate potential risks to human health and safety by making early detection of releases possible and by immediately reducing the amount of fuel available to be released into the environment.

Once the UST installation project is completed, the main source of safety risk would be vehicle traffic. The activities associated with this fleet fueling facility are analyzed in the Cumulative Impacts section of this EA.

As such, impacts to human health and safety would be short-term and minor.

***Secondary Impacts:***

No secondary impacts to human health and safety are expected as a result of the proposed project.

**12. INDUSTRIAL, COMMERCIAL AND AGRICULTURAL ACTIVITIES AND PRODUCTION: *Will the project add to or alter these activities? Will grazing lands, irrigation waters or crop production be affected?***

This project would not change the zoning of the project area which is Improved Property - Commercial. The zoning for this property was changed from agricultural to commercial before this project was started. Other grazing lands, irrigation waters, crop production, and industrial activity would not be affected by this project.

***Direct Impacts:***

There would be no impacts to industrial or agricultural activities or production. The change in the property use is long-term with negligible impact due to the existing commercial, agricultural, and residential character of the project area.

***Secondary Impacts:***

No secondary impacts to industrial, commercial, and agricultural activities and production would be expected as a result of the proposed project.

**13. QUANTITY AND DISTRIBUTION OF EMPLOYMENT: *Will the project create, move, or eliminate jobs? If so, estimated number.***

***Direct Impacts:***

During the construction phase of this UST installation project, approximately 10-15 jobs would be created for a period of 6 months. The project result (an UST system) is anticipated to have the potential to generate income in the local area, including jobs to run the convenience store for approximately 10-15 people.

No adverse impacts on quantity and distribution of employment would likely result from this project. The construction project plan calls for several short-term, contracted employees during construction. No lasting negative impacts to employment would be expected from this project.

***Secondary Impacts:***

No secondary impacts to quantity and distribution of employment are expected as a result of the proposed project.

**14. LOCAL AND STATE TAX BASE AND TAX REVENUES: *Will the project create or eliminate tax revenue?***

***Direct Impacts:***

The UST installation project is anticipated to generate additional local and state tax revenue. The activities associated with this UST installation are analyzed in the Cumulative Impacts section of this EA. This project is expected to create new jobs for the area.

***Secondary Impacts:***

No detrimental secondary impacts to local and state tax base and tax revenues would be expected as a result of the proposed project.

**15. DEMAND FOR GOVERNMENT SERVICES: *Will substantial traffic be added to existing roads? Will other services (fire protection, police, schools, etc.) be needed?***

This location is currently under construction to become a convenience store with a gas station.

An increase in law enforcement and fire protection activities (increased calls and routine patrols) in the area would not be necessary.

***Direct Impacts:***

The project result would only affect traffic on the property.

The UST installation project would add vehicle traffic to Main Street in the Town of Bridger. The impact would be long-term and minor.

The project result would not increase demand for fire protection or law enforcement.

***Secondary Impacts:***

After construction is finished, vehicle truck traffic would increase the risk of vehicle collisions. However, secondary impacts increasing the demand for government services are not anticipated.

**16. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS: *Are there State, County, City, USFS, BLM, Tribal, etc. zoning or management plans in effect?***

The Carbon County Growth Policy is in effect for this area. This growth policy was reviewed, and no conflicts were noted. There are no other known local, county, state, or federal environmental management plans that would impact this project development. The proposed project and associated development are expected to be in conformance with current Town of Bridger in Carbon County.

***Direct Impacts:***

DEQ is not aware of any other locally adopted environmental plans or goals that would impact this proposed project or the project area. Carbon County Growth Policy was reviewed, and no adverse environmental impacts were indicated. Impacts from or to locally adopted environmental plans and goals would not be expected as a result of this project.

***Secondary Impacts:***

No secondary impacts to the locally adopted environmental plans and goals are expected as a result of the proposed project.

**17. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES: *Are wilderness or recreational areas nearby or accessed through this tract? Is there recreational potential within the tract?***

No designated recreational properties are located within or accessed through the project area.

***Direct Impacts:***

No impacts to the access to or quality of recreational and wilderness activities would be expected to result from the project.

***Secondary Impacts:***

No secondary impacts to access and quality of recreational and wilderness activities would be

expected as a result of the proposed project.

**18. DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING: *Will the project add to the population and require additional housing?***

The project is located on commercial property on Main Street in a commercially zoned area in Bridger, MT.

***Direct Impacts:***

It is not anticipated that the project would add to the population or require additional housing. The project result, a fleet transportation facility, has no potential to add to the population and require additional housing. No impact to population density and housing would be expected from this UST installation project.

***Secondary Impacts:***

No secondary impacts to density and distribution of population and housing would be expected as a result of the proposed project.

**19. SOCIAL STRUCTURES AND MORES: *Is some disruption of native or traditional lifestyles or communities possible?***

The project is located on commercial property in the Town of Bridger. The project would not replace any preexisting structures and is consistent with the residential and commercial character of development at and around the project location.

***Direct Impacts:***

The proposed project would occur entirely on private land owned. No direct impacts of native or traditional lifestyles would be expected.

***Secondary Impacts:***

Secondary impacts to social structures and mores would not be expected as a result of the proposed project.

**20. CULTURAL UNIQUENESS AND DIVERSITY: *Will the action cause a shift in some unique quality of the area?***

The project is located on commercial property on Main Street in Bridger, Montana.

***Direct Impacts:***

The proposed project is consistent with the existing character of the adjacent commercial and residential properties. Other neighboring existing businesses are Family Dollar, IM Equipment

and Black Brew Coffee House. There are twelve residential properties within ½ mile of the project area. These are single family residences. No impacts to cultural uniqueness and diversity would be expected from this project. It is not anticipated that the action would cause a shift in the unique quality of the area.

No impacts to cultural uniqueness and diversity would be expected from this project.

***Secondary Impacts:***

No secondary impacts to cultural uniqueness and diversity would be expected as a result of the proposed project.

***PRIVATE PROPERTY IMPACTS: Are we regulating the use of private property under a regulatory statute adopted pursuant to the police power of the state? (Property management, grants of financial assistance, and the exercise of the power of eminent domain are not within this category). If not, no further analysis is required. Does the proposed regulatory action restrict the use of the regulated person's private property? If not, no further analysis is required. Does the agency have Legal discretion to impose or not impose the proposed restriction or discretion as to how the restriction will be imposed? If not, no further analysis is required. If so, the agency must determine if there are alternatives that would reduce, minimize or eliminate the restriction on the use of private property, and analyze such alternative.***

The proposed project would take place on private land owned by the applicant. DEQ's approval of the UST installation project may affect the use of real property by the applicant and by nearby private landowners. DEQ has determined, however, that the license conditions are reasonably necessary to ensure compliance with applicable requirements under the Montana Underground Storage Tank Act, which will minimize risk of petroleum impacts on neighboring properties, and compliance with UST requirements has been agreed to by the applicant. Therefore, DEQ's approval of the proposed action would not have private property-taking or damaging implications.

***Direct Impacts:***

The proposed project would occur entirely on private land owned by 22 Group, LLC. No direct impacts of private property are expected due to the are being zoned Partially Exempt Property – Commercial.

***Secondary Impacts:***

Secondary impacts to private property would not be expected as a result of the proposed project.

**21. OTHER APPROPRIATE SOCIAL AND ECONOMIC CIRCUMSTANCES:**

DEQ is not aware of any other appropriate social and economic circumstances that are related to this project. Due to the nature of the proposed activities, no further direct or secondary impacts would be anticipated from this project.



## **ALTERNATIVES CONSIDERED:**

In addition to the proposed action, DEQ also considered the "no action" alternative. The "no action" alternative would deny the approval of the proposed action. The applicant would lack the authority to install the UST system on their private land. The no action alternative forms the baseline from which the impacts of the proposed action can be measured.

If the applicant demonstrates compliance with all applicable rules and regulations as required for approval, the "no action" alternative would not be appropriate. Pursuant to § 75-1-201(4), MCA, DEQ "may not withhold, deny, or impose conditions on any permit or other authority to act based on" an environmental assessment.

## **CUMULATIVE IMPACTS:**

Cumulative impacts are the collective impacts on the human environment within the immediate vicinity of the proposed project. when considered in conjunction with other past and present actions related to the Proposed Action by location and generic type. Related future actions must also be considered when these actions are under concurrent consideration by any state agency through preimpact statement studies, separate impact statement evaluation, or permit processing procedures.

This environmental review analyzes the proposed project submitted by the applicant. In addition to the proposed action, the applicant has obtained various permits and licenses for the construction of the building and infrastructure for the new fuel facility.

The proposed project is located on Main Street in Bridger Montana located in Section 21, Township 6 South, Range 26 East in Carbon County. The proposed project address 401 N Main St in Bridger, Montana. The project area is currently under construction for the convenience store.

No other FWP, DNRC, BLM, or USFS regulated projects were identified within one mile of the proposed project.

DEQ considered all impacts related to this project and secondary impacts that may result. Cumulative impacts related to this project would not be significant.

## **PUBLIC INVOLVEMENT:**

DEQ published a Draft EA on Montana DEQ's website and a 10-day public comment period. A copy of this Environmental Assessment has been posted on our website at [Public Participation & Engagement at DEQ, MEPA at Montana DEQ \(mt.gov\), and Open Public Comment Periods at Montana DEQ \(mt.gov\)](#). The public was invited to provide public comment on the Draft EA.

Internal scoping consisted of internal review of the environmental assessment document by DEQ staff. Scoping efforts also included queries to the following websites/ databases/ personnel:

- Montana State Historic Preservation Office

- Town of Bridger
- Carbon County, MT
- Montana Sage Grouse Habitat Conservation Program
- Montana Fish, Wildlife, and Parks
- Montana Department of Environmental Quality
- US Geological Society - Stream Stats
- Montana Natural Heritage Program
- Montana Cadastral Mapping Program
- Montana Groundwater Information Center
- Montana Bureau of Mines and Geology
- United States Environmental Protection Agency
- United States Department of Fish and Wildlife Service
- Google Maps and Google Earth

#### **OTHER GOVERNMENTAL AGENCIES WITH JURISDICTION:**

The proposed project would be fully located on private land owned by 26 Group, LLC. All applicable state and federal rules must be adhered to, which may also include other local, state, federal, or tribal agency jurisdiction.

#### **NEED FOR FURTHER ANALYSIS AND SIGNIFICANCE OF POTENTIAL IMPACTS**

When determining whether the preparation of an environmental impact statement is needed, DEQ is required to consider the seven significance criteria set forth in the Administrative Rules of Montana (ARM) 17.4.608, which are as follows:

1. The severity, duration, geographic extent, and frequency of the occurrence of the impact; “Severity” is analyzed as the density of the potential impact while “extent” is described as the area where the impact is likely to occur. An example could be that a project may propagate ten noxious weeds on a surface area of 1 square foot. In this case, the impact may be a high severity over a low extent. If those ten noxious weeds were located over ten acres there may be a low severity over a larger extent. “Duration” is analyzed as the time period in which the impact may occur while “frequency” is how often the impact may occur. For example, an operation that occurs throughout the night may have impacts associated with lighting that occur every night (frequency) over the course of the one season project (duration).
2. The probability that the impact will occur if the proposed action occurs; or conversely, reasonable assurance in keeping with the potential severity of an impact that the impact will not occur;
3. Growth-inducing or growth-inhibiting aspects of the impact, including the relationship or contribution of the impact to cumulative impacts;
4. The quantity and quality of each environmental resource or value that would be affected, including the uniqueness and fragility of those resources and values;
5. The importance to the state and to society of each environmental resource or value that would be affected;
6. Any precedent that would be set as a result of an impact of the proposed action that would

commit the department to future actions with significant impacts or a decision in principle about such future actions; and

7. Potential conflict with local, state, or federal laws, requirements, or formal plans.

## **SIGNIFICANCE DETERMINATION**

The severity, duration, geographic extent, and frequency of the occurrence of the impacts associated with the proposed state action would be limited. 26 Group, LLC is proposing to install an UST system at the or their new convenience store location in Bridger, Montana.

DEQ has not identified any significant impacts associated with the proposed installation and operation for any environmental resource. Approving the 26 Group, LLC installation and operation does not set precedent that commits DEQ to future actions with significant impacts or a decision in principle about such future actions. If the applicant submits another license application, DEQ is not committed to issue those authorizations. DEQ would conduct another environmental review for any subsequent authorizations sought by the applicant. DEQ would then decide based on the criteria set forth in the Underground Storage Tank Installer and Inspector Licensing and Permitting Act, Section 75-11-212, et seq, Montana Code Annotated (MCA) and the Montana Underground Storage Tank Act, Section 75-11-501, MCA et seq. and administrative rules adopted under those Acts at Administrative Rule of Montana (ARM) Title 17, chapter 56.

Approving permit number 23-0244 and issuing an operating permit allowing installation and operation of the underground storage tanks at UST Facility number 00-32519 does not set a precedent for DEQ's review of other applications, including the level of environmental review. The level of environmental review decision is made based on a case-specific consideration of the criteria set forth in ARM 17.4.608.

The proposed state action presents additional growth-inducing infrastructure to the already urban geographic location. Based on a consideration of the criteria set forth in ARM 17.4.608, the proposed state action is not predicted to significantly impact the quality of the human environment. Therefore, at this time, preparation of an environmental assessment is determined to be the appropriate level of environmental review under the Montana Environmental Protection Act.

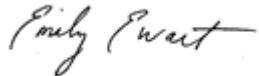
**Environmental Assessment Prepared By:**

**Kitrina Persson**

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Tanks, Brownfields, and Federal Facilities Bureau

**Approved By:** Emily Ewart

**SIGNATURE**

A handwritten signature in black ink that reads "Emily Ewart". The signature is written in a cursive, flowing style.

Date

July 11, 2023

Emily Ewart, Underground Storage Tank Section Supervisor  
Department of Environmental Quality